



February 24, 2015  
Via ECFS

Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36**  
**Annual 64.2009(e) CPNI Certification for Calendar Year 2014**  
**CIMA Telecom, Inc. 499 Filer ID 823122**  
**Auris, LLC 499 Filer ID 823802**  
**CTI Wholesale Services, LLC 499 Filer ID 826398**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2014 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of CIMA Telecom, Inc., Auris, LLC and CTI Wholesale Services, LLC.

Any questions you may have concerning this filing may be directed to me at 407-740-3019 or via email to [dgainor@tminc.com](mailto:dgainor@tminc.com).

Sincerely,

/s/Debbie Gainor  
Debbie Gainor  
Consultant to CIMA Telecom, Inc.  
And Auris, LLC  
And CTI Wholesale Services, LLC

*DG/mp*  
Attachment  
cc: J. Medina – CIMA (via email)  
file: CIMA – FCC CPNI  
tms: FCx1401 CPNI

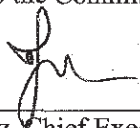
**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB DOCKET 06-36**

Annual 64.2009(e) CPNI Certification for :	Calendar Year 2014
Name of Company covered by this certification:	<b>CTI Wholesale Services, LLC</b>
<b>Form 499 Filer ID</b>	<b>826398</b>
Name of Signatory:	Juan Martin Gomez
Title of Signatory:	Chief Executive Officer

I, Juan Martin Gomez, certify and state that:

1. I am Chief Executive Officer of CTI Wholesale Services, LLC, and, acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules *See* 47 C.F.R. § 64.2001 *et seq.*
2. Attached to this certification, as Exhibit A, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken any actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
\_\_\_\_\_  
Juan Martin Gomez, Chief Executive Officer  
CTI Wholesale Services, LLC

2/23/15  
\_\_\_\_\_  
Date

Attachments: Accompanying Statement explaining CPNI procedures – Attachment A  
Explanation of actions taken against data brokers – not applicable  
Summary of customer complaints – not applicable

Attachment A  
Statement of CPNI Procedures and Compliance

**CIMA Telecom, Inc.**  
**and**  
**Auris, LLC**  
**and**  
**CTI Wholesale Services, LLC**

Calendar Year 2014

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

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**CIMA Telecom, Inc.  
Auris, LLC  
CTI Wholesale Services, LLC**

**Statement of CPNI Procedures and Compliance**

CIMA Telecom, Inc., Auris, LLC and CTI Wholesale Services, LLC ("Companies") each provide wholesale telecommunications services to other carriers and as such do not have any subscribed or direct service relationship with any business or residential end user customers. The Companies do not obtain, retain or use CPNI for any purpose. Although the Companies have call detail records, they do not have any information regarding the calling or called party, and such information is not used for marketing purposes. The Companies are committed to protecting the confidentiality of all customer information, including CPNI and call detail records. Company employees for each entity are prohibited from disclosing such information and each Company has procedures which provide for disciplinary action for such violations, up to and including termination of employment.

Moreover, the Companies do not market their services to end users in any fashion. Instead, marketing efforts are directed towards resellers and other carriers. Marketing efforts do not include the use of CPNI or call detail records.

The Companies do not disclose call record information over the telephone.

The Companies do not disclose detail records on-line.

The Companies do not have any retail locations and therefore does not disclose call detail records in-store.

Should any of the Companies expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI, including call detail records, is used or disclosed.

Requests for call detail records by law enforcement agencies are only granted under subpoena.

**CIMA Telecom, Inc.  
Auris, LLC  
CTI Wholesale Services, LLC**

**Statement of CPNI Procedures and Compliance  
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The Companies have in place procedures to notify law enforcement in the event of a breach of customers' CPNI, including call detail records, to ensure that notification is provided in the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, each Company has a process to record all breaches discovered and will provide notification to the United States Secret Service, FBI and customers, to the extent possible.

None of the Companies have not taken any actions against data brokers in the last year.

None of the Companies did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, including call detail records, in calendar year 2014.

None of the Companies have not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.